

**Federal Defenders
OF NEW YORK, INC.**

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The Honorable Lewis A. Kaplan
Southern District of New York
500 Pearl Street
New York, NY 10007

November 22, 2019

The existing motion schedule is
extended by 7 days. Oral argument
and conference postponed to
1/14/20 at 2pm. The trial date is
unchanged.
SO ORDERED

Re: United States v. Demetruus Bell
19 Cr. 717 (LAK)


LEWIS A. KAPLAN, USBJ

Dear Judge Kaplan:

I write with the consent of the Government to respectfully request the adjournment of Mr. Bell's trial, suppression hearing, and motion schedule by at least 45 days from each of their current deadlines. The defense received Mr. Bell's discovery materials on October 30, 2019 and October 31, 2019. After reviewing them with Mr. Bell and preparing to file defense motions, we determined that we would benefit from additional records not included in the Rule 16 discovery to adequately prepare to file our suppression motion. We have since requested those records but need time to receive them and review them. As such, the defense respectfully requests adjourning each of the previously set deadlines by 45 days. The defense anticipates that after the Court reaches a decision on the suppression motion, it is likely that this case will resolve without a trial. The defense waives Mr. Bell's right to a speedy trial in order to procure these records and to file motions.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ 

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cc: AUSA Nicholas Bradley, Esq.